

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

CITY OF NEWARK,	:	
	:	
Plaintiff,	:	No. 2:25-cv-02225-JKS-LDW
	:	
- against -	:	
	:	
GEO RE-ENTRY GROUP, LLC;	:	
ABC CORPS. (A FICTIOUS	:	
COMPANY) 1-100,	:	DECLARATION OF
	:	RICHARD KENT LONG
	:	
Defendants.	:	
	:	
	X	

I, Richard Kent Long, declare under 28 U.S.C. § 1746 as follows:

1. I execute this declaration in support of Defendant The GEO Group, Inc., incorrectly sued as GEO Re-Entry Group, LLC (“GEO”).
2. I am the Senior Vice President of Project Development and an employee of GEO. I have been involved in the engineering and construction industry for 39 years.
3. I am responsible for oversight of all construction, maintenance, and design of GEO facilities, including the Delaney Hall Facility in Newark, New Jersey (“Delaney Hall” or the “Facility”).
4. Delaney Hall is constantly maintained to ensure that the Facility and its systems are operational and meet or exceed all applicable standards, which

includes compliance with all applicable federal, state, and local safety laws. This is an ongoing process as the Facility is over 100,000 square feet.

5. As part of that process, Engineering Consulting Services (“ECS”)—an independent third-party engineering firm—conducted a property condition assessment of Delaney Hall on April 11, 2025. No observable conditions were noted during that assessment. A final report detailing the results of the assessment has not yet been issued.

6. The work GEO has performed at Delaney Hall since 2023 did not require issuance of a building permit. As such, no permits were applied for on behalf of the Facility since that time.

7. The only notice that Newark has provided GEO regarding any issues with Delaney Hall are two identical “Stop Construction Notice” tags dated March 31, 2025, with an illegible signature, which did not cite any provision of violated code, state the reasons for the order, or provide the conditions under which construction may be resumed. A true and correct copy of the March 31, 2025, Stop Construction Notice tags is attached as **Exhibit A**.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 15th day of April 2025, in Boca Raton, Florida.



Richard Kent Long